

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff:	George and Janet Rowland 522 Richard Drive Millville, NJ 083323
Address of Defendant:	See attached List
Place of Accident, incident or Transaction:	Various
<i>(Use Reverse Side for Additional Space)</i>	

Does this case involve multidistrict litigation possibilities? Yes No

RELATED CASE IF ANY

Case Number:	01-CV-5981	Judge	Date Terminated:	N/A
--------------	------------	-------	------------------	-----

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

CIVIL: (Place an in ONE CATEGORY ONLY)

A. Federal Question Cases:	B. Diversity Jurisdiction Cases:
1. <input type="checkbox"/> Indemnity Contract, Marine Contract, and All Other Contracts	1. <input type="checkbox"/> Insurance Contract and Other Contracts
2. <input type="checkbox"/> FELA	2. <input type="checkbox"/> Airplane Personal Injury
3. <input type="checkbox"/> Jones Act — Personal Injury	3. <input type="checkbox"/> Assault, Defamation
4. <input type="checkbox"/> Antitrust	4. <input type="checkbox"/> Marine Personal Injury
5. <input type="checkbox"/> Patent	5. <input type="checkbox"/> Motor Vehicle Personal Injury
6. <input type="checkbox"/> Labor-Management	6. <input type="checkbox"/> Other Personal Injury (Please specify)
7. <input type="checkbox"/> Civil Rights	7. <input type="checkbox"/> Products Liability
8. <input type="checkbox"/> Habeas Corpus	8. <input type="checkbox"/> Products Liability — Asbestos
9. <input type="checkbox"/> Securities Act(s) Cases	9. <input type="checkbox"/> All other Diversity Cases
10. <input type="checkbox"/> Social Security Review Cases	(Please specify)
11. <input checked="" type="checkbox"/> All other Federal Question Cases (please specify)-Related to Chapter 11 Filing	

ARBITRATION CERTIFICATION

(Check appropriate category)

I, _____, counsel of record do hereby certify:

Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000 exclusive of interest and costs;

Relief other than monetary damages is sought.

DATE: _____ *Attorney-at-Law* _____ *Attorney I.D. #* _____

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: _____ *Attorney-at-Law* _____ *Attorney I.D. #* _____

Defendants (Names and Addresses):

Ford Motor Company
Parklane Towers West
Suite 1500
Three Parklane Boulevard
Dearborn, MI 48126-2568

Federal-Mogul Global, Inc., individually and/or as parent company, successor in interest, or indemnitor to or of:

Fel-Pro, Inc.,

Ferodo America, Inc.,

Gasket Holdings, Inc., formerly known as Flexitallic Gasket Company,

Moog Automotive Inc., formerly known as Wagner Electric Corporation,

Pneumo Abex Corp., or

T&N plc.

2655 Northwestern Highway
Southfield, MI 48034

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I (a) PLAINTIFFS

George and Janet Rowland

DEFENDANTS

SEE ATTACHED

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF _____
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE. IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
Laurence H. Brown, Esquire
Rosenberg, Brown & Sandler
17th Floor, One Penn Square West
Philadelphia, PA 19102
(215) 569-4000

ATTORNEYS (IF KNOWN)
Lavin, Coleman, O'Neil, Ricci, Finarelli & Gray
Penn Mutual Tower
510 Walnut Street - Suite 1000
Philadelphia, PA 19106
(215) 627-0303

II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)

1 U.S. Government Plaintiff
 3 Federal Question (U.S. Government Not a Party)
 2 U.S. Government Defendant
 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6

IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE)
DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Action for personal injury for asbestos exposure against Federal-Mogul Global, Inc., or companies it purchased and removing defendants, removed pursuant to 28 U.S.C. § 1452(a).

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 442 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med Malpractice	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury Product Liability		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input checked="" type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 450 Commerce/ICC Rates/etc
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine			<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability			<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle			<input type="checkbox"/> 850 Securities/Commodities Exchange
<input type="checkbox"/> 160 Stockholders Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 892 Economic Stabilization Act
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	SOCIAL SECURITY	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus	<input type="checkbox"/> 861 HIA (139f)	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 520 General	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 863 DIWC/DIWV (405(g))	<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 550 Other	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 290 All Other Real Property				

VI. ORIGIN	(PLACE AN X IN ONE BOX ONLY)	Transferred from	Appeal to District Court
<input type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Restated or Reopened

VII. REQUESTED IN COMPLAINT:	CLASS ACTION	DEMAND \$	Check YES only if demanded in complaint
<input type="checkbox"/> UNDER F.R.C.P. 23		Unspecified	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

VIII. RELATED CASE(S) (See instructions): IF ANY	JUDGE	DOCKET NUMBER
		01-CV-5981

DATE	SIGNATURE OF ATTORNEY OF RECORD
June 17, 2002	Edward T. Finch, Esquire

RECEIPT #	AMOUNT	APPLYING IFP	JUDGE	MAG. JUDGE
-----------	--------	--------------	-------	------------

Defendants (Names and Addresses):

Ford Motor Company
Parklane Towers West
Suite 1500
Three Parklane Boulevard
Dearborn, MI 48126-2568

Federal-Mogul Global, Inc., individually and/or as parent company, successor in interest, or indemnitor to or of:

Fel-Pro, Inc.,

Ferodo America, Inc.,

Gasket Holdings, Inc., formerly known as Flexitallic Gasket Company,

Moog Automotive Inc., formerly known as Wagner Electric Corporation,

Pneumo Abex Corp., or

T&N plc.

2655 Northwestern Highway
Southfield, MI 48034

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

GEORGE and JANET ROWLAND

CASE NO.

V.

FORD MOTOR COMPANY
FEDERAL-MOGUL GLOBAL, INC.

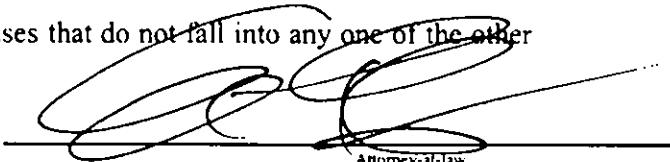
In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See §1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2441 through §2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 8. ()
- (d) Asbestos - Cases involving claims for personal injury or property damage from exposure to asbestos. (X)
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

June 17, 2002

(Date)



Attorney-at-Law

Edward T. Finch, Esquire

Attorney For

Ford Motor Company

(Civ. 660)

12/91

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GEORGE and JANET ROWLAND

CASE NO.

V.

FORD MOTOR COMPANY
FEDERAL-MOGUL GLOBAL, INC.

NOTICE OF REMOVAL

Defendant Ford Motor Company (the "removing defendant") hereby gives notice of the removal to the United States District Court for the Eastern District of Pennsylvania of the claims which have been asserted against them in the action captioned George and Janet Rowland v. AC&S, Inc., et al. now pending in the Court of Common Pleas of Philadelphia County, at No. 0106-2484. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452(a), and as grounds for removal the removing defendant states the following:

1. The action of which the removed claims are a part was commenced in the Court of Common Pleas of Philadelphia County.

2. The removed claims are those for personal injury or wrongful death asserted against the automobile manufacturers on the basis of alleged exposure to certain of their asbestos-containing products, including brakes and other automotive parts, manufactured for the automobile manufacturers by Federal-Mogul Global, Inc., or companies that it purchased, one or more of which is a co-defendant of the automobile manufacturers.

3. On October 1, 2001 Federal-Mogul Global, Inc. filed a voluntary petition for protection under Chapter 11 of the United States Bankruptcy Code, commencing bankruptcy case

number 01-10578 (the "Federal-Mogul Bankruptcy Case") currently pending in the United States Bankruptcy Court for the District of Delaware.

4. The removed claims may be removed to this Court pursuant to 28 U.S.C. § 1452(a): (i) the removed claims are asserted in a civil action not exempt from removal; and (ii) the Court has jurisdiction of the removed claims under 28 U.S.C. § 1334. All claims asserted against the Removing Defendant is related to the Federal-Mogul Bankruptcy Case, and the continued prosecution, outcome at trial or other resolution of the claims will have an effect on the administration of the Federal-Mogul Bankruptcy Case.

5. Removal to this Court is timely pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(3) in that the Federal-Mogul Bankruptcy Case was pending when the removed claims were asserted on or after October 1, 2001 and in that this notice has been filed within 30 days of receipt by one or all of the automobile manufacturers of a copy of the initial pleading setting forth the removed claims.

6. Upon removal, the proceedings with respect to the removed claims are non-core. The automobile manufacturers do not consent to entry of a final order or judgment by the bankruptcy judge to the extent the bankruptcy court is authorized to hear or determine such claims consistent with 28 U.S.C. § 157(b)(5).

7. The purpose of removal is to facilitate transfer of the removed claims to the United States District Court for the District of Delaware, the district court presiding over the Federal-Mogul Bankruptcy Case, to resolve on a consolidated basis the common threshold scientific issues concerning whether brakes and other automotive parts cause disease. *See, e.g., In re Dow Corning Corp.*, 1995 W.L. 495978, at *2 (Bankr. E.D. Mich. Aug. 9, 1995) (personal injury tort claims

transferred to bankruptcy court pursuant to 28 U.S.C. § 157(b)(5) to resolve threshold scientific issues concerning whether silicone breast implants caused disease after removal to federal court pursuant to 28 U.S.C. § 1452(a)).

8. On November 20, 2001, the automobile manufacturers filed in the Federal-Mogul Bankruptcy Case a motion pursuant to 28 U.S.C. § 157(b)(5) to transfer this and all other claims related to brakes and automotive parts for consolidated resolution of the threshold scientific issues concerning whether brakes and other automotive parts cause disease.

9. On December 10, 2001 the Honorable Alfred M. Wolin issued the attached Order provisionally transferring pursuant to 28 U.S.C. § 157(b)(5) the claims asserted against the automobile manufacturers to the United States District Court for the District of Delaware.

10. On January 3, 2002, Judge Wolin issued a letter opinion and order reiterating that all asbestos friction claims against the automobile manufacturers pending in federal courts as of December 10 had been transferred, and ordering any claims removed after December 10 transferred as well. A copy of the Order and Opinion are attached to this Notice.

11. On February 8, 2002, the Honorable Alfred M. Wolin denied the “Motions to Transfer the ‘Friction Claims’” and simultaneously remanded the friction products claims. Attached hereto is a copy of said Order.

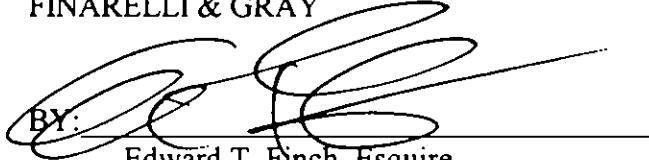
12. However, on February 11, 2002, the United States Court of Appeals for the Third Circuit granted a Temporary Stay of Judge Wolin’s February 8, 2002 Court Order so that the matter could be considered by a three-judge panel of that court. Attached hereto is a copy of said Order.

13. The Removing Defendant files this Notice of Removal to adequately protect the interests of Removing Defendant and to facilitate transfer of these claims to the United States District Court for the District of Delaware pursuant to Judge Wolin's provisional transfer order.

14. The automobile manufacturers will comply with 28 U.S.C. § 1446(d) by promptly giving notice of the filing of this Notice of Removal to all adverse parties to the action pending in the state court and filing a copy of this Notice of Removal with the prothonotary of the Court of Common Pleas of Philadelphia County.

Respectfully submitted,

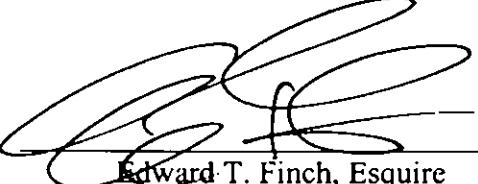
LAVIN, COLEMAN, O'NEIL, RICCI,
FINARELLI & GRAY



BY: _____
Edward T. Finch, Esquire
Attorney for Defendant
Ford Motor Company

CERTIFICATE OF SERVICE

I, Edward T. Finch, Esquire, hereby certify that pursuant to 28 U.S.C. § 1446(d) written notice of the removal of this action will be promptly given to all adverse parties and a copy of the Notice of Removal will be filed with the Court of Common Pleas.



Edward T. Finch, Esquire

PRESENTED FOR REVIEW
02 MAY -2 AM 11:08
PRO PROTHY

OFFICE OF THE SECRETARY
JOHN M. RINTAMAKI

BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9981
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA 19102
(215) 569-4000

02 MAY 20 P 1:22

ATTORNEY FOR PLAINTIFF(S)

Plaintiffs:

GEORGE AND JANET ROWLAND
522 RICHARD DRIVE
MILLVILLE, NJ 08332

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

JUNE TERM 2001

No. 2484

Defendants:

AC&S, INC. (001), ET AL.
A PENNSYLVANIA CORPORATION
120 N. LIME STREET
LANCASTER, PA 17604

ASBESTOS LITIGATION

THIRD AMENDED COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone 215-238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defendarse de estos demandas expresadas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta presentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Se avisa que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA
SERVICIO DE DEFERENCIA E INFORMACIÓN LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Telephone: 215-238-1701

ALLIED SIGNAL, INC. (280)
101 Columbia Road
Morristown, NJ 07962

AMERICAN STANDARD (050)
c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

A.P. GREEN REFRactories COMPANY (110)
a Delaware Corporation
Green Blvd.
Mexico, Missouri 65265

ASTEN HILL GROUP, INC. (340)
4399 Corporate Road
P.O. Box 10700
Charleston, SC 29411

A.W. CHESTERTON, INC. (127)
Middlesex Industrial Park
Route 93
Stoneham, MA 02180

BEAZER EAST, INC. (440)
f/k/a Koppers Co.
c/o Koppers Building
436 7th Avenue
Pittsburgh, PA 15219

BORG WARNER CORPORATION (055)
200 S. Michigan Avenue
Chicago, IL 60604

CERTAIN-TEED CORPORATION (090)
750 E. Swedesford Road
Valley Forge, PA 19482

COMBUSTION ENGINEERING CO., INC. (059)
c/o CVCSC, INC.
175 Capital Boulevard
P.O. Box 4950
Rocky Hill, CT 06067

CRANE CO., DEMMING DIVISION
884 S. Broadway
Salem, OH 44460

CRANE PACKING (060)
24 Madison Road
Fairfield, NJ 07004

CROWN CORK & SEAL COMPANY, INC. (091)
9300 Ashton Road
Philadelphia, PA 19114

DANA CORPORATION (061)
4500 Dorr Street
P.O. Box 1000
Toledo, OH 43615
OR
Corporate Trust, Inc.
Resident Agent
32 South Street
Baltimore, MD 21202

DURABLA
140 Sheree Blvd.
Lionville, PA 19353

FERODO AMERICA, INC.
c/o The Corporation Trust Co.
1209 Orange Street
Wilmington, DE 19801

FLEXITALIC GASKET COMPANY (018)
6915 Highway 225
Deer Park, TX 77536

FOSECO, INC. (109)
c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

GARLOCK, INC. (022)
One Marine Midland Plaza
Suite 1830
Rochester, NY 14604-2415

GENERAL REFRactories (065)
225 City Avenue, Suite 114
Bala Cynwyd, PA 19004

GOULDS PUMPS, INC. (435)
240 Fall Street
Seneca Falls, NY 13148

GREEN, TWEEd & COMPANY, INC. (132)
2075 Detweiler Road
Kulpsville, PA 19443

HAJOCa PLUMBING SUPPLY COMPANY (258)
950 Township Line Road
Chester, PA 19013

HARBISON WALKER REFRactories (234)
a Division of Dresser Industries, Inc.
One Gateway Center
Pittsburgh, PA 15222

J.H. FRANCE REFRactories CO. (227)
895 Clarence Road
Snow Shoe, PA 16874

MAREMONT CORPORATION (072)
2400 Industrial Park
Louden, TX 37774

MELRATH GASKET, INC. (260)
2901 W. Hunting Park Ave.
P.O. Box 43099
Philadelphia, PA 19129-3099

METROPOLITAN LIFE INSURANCE CO. (4019)
1 Madison Avenue
New York, NY 10010

NORTH AMERICAN ASBESTOS COMPANY (094)
c/o Cindy Bavaro
Lord, Bisell & Brooks
115 S. LaSalle Street
Chicago, IL 60603

NOSROC CORPORATION (029)
a Pennsylvania Corporation
c/o CT Corporation Systems
Suite 1210, 1515 Market Street
Philadelphia, PA 19103

OWENS-ILLINOIS, INC. (032)
an Ohio Corporation
One Sea Gate -WMB9
Toledo, OH 43666

PECORA CORPORATION (429)
a Pennsylvania Corporation
165 Wambold Road
Harleysville, PA 19438

PFIZER, INC. (102)
235 E. 42nd Street
New York, NY 10017

PORTER HAYDEN COMPANY (075)
c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

QUIGLEY CO., INC. (319)

235 E. 42nd Street
New York, NY 10017

OR

c/o CT Corporation Systems
registered agents of Quigley Co.
1633 Broadway, 23rd Floor
New York, NY 10019

RAPID AMERICAN CORPORATION (14095)

1700 Broadway, Suite 1403
New York, NY 10019

RITE HOSE & PACKING, INC.

as successor to BEVCO INDUSTRIES, INC. (154)
a Pennsylvania Corporation
c/o Corporate Service Co.
319 Market Street
Harrisburg, PA 17101

TURNER & NEWALL, LTD (042)

20 St. Mary's Parsonage
Manchester, England M3 2NL

UNION CARBIDE CORPORATION (081)

c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

UNIROYAL, INC. (043)

70 Great Hill Road
Naugatuck, CT 06770

U.S. GYPSUM COMPANY (045)

c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

WEIL McLAIN CO. (163)
Division of The Marley Company
Blaine Street
Michigan City, IN 46360

VIACOM/WESTINGHOUSE ELECTRIC CORPORATION (099)
11 Stanwix Street
Pittsburgh, PA 15222-1384

A-BEST PRODUCTS COMPANY
c/o R. Kenneth Willman
705 McKnight Park Drive
Pittsburgh, PA 15237

DIXON TICONDEROGA COMPANY
195 International Parkway
Heathrow, FL 32746

GEORGE V. HAMILTON, INC.
River Avenue
McKee Rocks, PA 15136

INSUL COMPANY, INC.
110 N. Market Street
East Palestine, OH 44413

QUIGLEY CO., INC. (319)
235 E. 42nd Street
New York, NY 10017

OR
c/o CT Corporation Systems
registered agents of Quigley Co.
1633 Broadway, 23rd Floor
New York, NY 10019

SAFETY FIRST INDUSTRIES
c/o Joseph R. Schaper, Esquire
Heintzman Warren Wise & Fornella
35th Floor, Gulf Tower
Pittsburgh, PA 15219

and

Richard M. Grudzinski, Senior Manager

Peat Marwick Thorne, Inc.

Commerce Court West

P.O. Box 31

Toronto, Ontario M5L 1B2 CANADA

and

SAFETY FIRST INDUSTRIES, INC.

c/o Ms. Christine Wendt

The Travelers Companies

Special Liability Group

P.O. Box 17283

Baltimore, MD 21203-7283

TYK REFRactories

301 Brickyard Road

Clairton, PA 15025

ATLAS INDUSTRIES

a/k/a **ATLAS INSULATION, INC.**

530 Bell Avenue

Carnegie, PA 15106

DRESSER INDUSTRIES, INC. (108)

c/o James W. Ferguson

4100 Clinton Drive, Bldg. 01-631

Houston, TX 77020

FORD MOTOR COMPANY (105)

The Royal Headquarters

The American Road

Dearborn, Michigan 48121

Attn: Legal Department

HALLIBURTON COMPANY

4100 Clinton Drive

Building 01-631

Houston, TX 77020

BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9991
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA. 19102
(215) 569-4000

ATTORNEY FOR PLAINTIFF(S)

Plaintiffs:

GEORGE AND JANET ROWLAND

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
CIVIL TRIAL DIVISION

vs.

Defendants:

AC&S, INC., (001), ET AL.

JUNE TERM 2001

No. 2484

ASBESTOS LITIGATION

THIRD AMENDED COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS

Plaintiff incorporates by reference Plaintiffs' Master Long Form Complaint In Re: Asbestos Litigation in Philadelphia Court of Common Pleas, filed as of October Term, 1986, No. 8610-0001. Pursuant to an Order dated July 30, 1986 and signed by the Honorable Richard B. Klein and the Honorable Edward J. Blake the following short form complaint is utilized in this asbestos action.

1. This Third Amended Complaint involves the claims of the following persons:

a. Plaintiff:

Name: George Rowland
Address: 522 Richard Drive
Millville, NJ 08332
Social Security No. 174-24-2547
Date of Birth: 6/28/30

b. Spouse ("Plaintiff-Spouse"):

Name: Janet Rowland
Date of Birth: 10/15/36

2. The defendants are those companies listed in the caption.

3. Plaintiffs would also name as defendants the Johns-Manville Corporation, the Johns-Manville Sales Corporation, UNARCO, Amatex Corporation, Forty-Eight Insulators Incorporated, Wallace and Gale Company, Nicolet Industries, Pacor, Inc., Delaware Insulation, Inc. f/k/a DI Distributors, Carey Canada, Celotex Corporation, Eagle Picher Industries, Inc., Keene Corporation, H.K. Porter Company, Inc., Babcock & Wilcox, and Pittsburgh Corning Corporation; however, each of these potential defendants has filed for relief or been forced into involuntary bankruptcy under Chapter 11 of the Bankruptcy Code and, pursuant to 11 U.S.C. Section 362, the institution of actions against these companies is stayed. Plaintiffs would have brought suit against the companies enumerated in this paragraph but for the automatic stay.

4. A. Defendant, **Metropolitan Life Insurance Company**, is a mutual life insurance company with a principal place of business in the New York. At all relevant times Defendant did business in the State of New Jersey and the Commonwealth of Pennsylvania. Defendant, individually and as agents of one another and as co-conspirators, aided, abetted, encouraged, counseled, assisted, agreed, and conspired among themselves and with other asbestos manufacturers and distributors to injure Plaintiffs by, among other things, providing funding for a study that revealed Canadian asbestos miners suffered from asbestosis and by materially misrepresenting that known fact, and in various other ways concealing information and otherwise preventing workers and responsible authorities from learning of the health hazards posed by asbestos exposure.

B. Defendant, **A-Best Products Company**, in its own right and as successor-in-interest to Asbestos Products Company, is a corporation incorporated under the laws of the State of Ohio, having its principal place of business located in Cleveland, Ohio, and is qualified to do business or has transacted business in the Commonwealth of Pennsylvania.

C. Defendant, **Dixon Ticonderoga Company**, and its division New Castle Refractories Co., is a corporation incorporated under the laws of the State of Delaware, having its principal place of business located in Vero Beach, Florida, and is qualified to do business or has transacted business in the Commonwealth of Pennsylvania.

D. Defendant, **George V. Hamilton, Inc.**, is a corporation incorporated under the laws of the Commonwealth of Pennsylvania, having its principal place of business located in McKees Rocks, Pennsylvania, and is qualified to do business in the Commonwealth of Pennsylvania.

E. Defendant, **Insul Company, Inc.**, is a corporation incorporated under the laws of the State of Ohio, having its principal place of business located in East Palestine, Ohio, and is qualified to do business in the Commonwealth of Pennsylvania.

F. Defendant, **Safety First Industries, Inc.**, in its own right and as successor-in-interest to Safety First Supply, Inc., is a corporation incorporated under the laws of the Commonwealth of Pennsylvania, having its principal place of business located in Pittsburgh, Pennsylvania, and is qualified to do business in the Commonwealth of Pennsylvania.

G. Defendant, **TYK Refractories Company**, in its own right and as successor-in-interest to Swank Refractories, is a corporation incorporated under the laws of the Commonwealth of Pennsylvania, having its principal place of business located in Sewickley, Pennsylvania, and is qualified to do business in the Commonwealth of Pennsylvania.

5. Plaintiff hereby incorporates by reference the following Counts from the Master Long-Form Complaint: Counts: I, II, III, IV, V, VI, VII & X.

6. Plaintiff's asbestos employment history including, to the extent possible at this time, the asbestos products to which plaintiff was exposed, is attached hereto as Schedule 1.

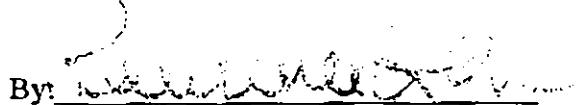
7. Plaintiff was diagnosed on or about April, 2001 as having mesothelioma as a result of exposure to asbestos.

8. Plaintiff's smoking history is as follows: Plaintiff smoked 1 pack per day from 1947 to 2001.

9. A claim for lost wages will be asserted at time of trial, if applicable.

Brookman, Rosenberg, Brown and Sandler

By:


Laurence H. Brown, Esquire

VERIFICATION

I hereby certify that I am a Plaintiff in the instant matter and that the facts contained herein are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsification to authorities.

George F. Lawlor, Jr.

PLAINTIFF'S ASBESTOS WORK HISTORY - SCHEDULE 1

<u>Commencement</u>	<u>Cessation</u>	<u>Employer</u>	<u>Job Description</u>
1951	1960	Bethlehem Steel	brick layer
7/1961	9/1993	Rock-Tenn	paper converter
1952	1953	U.S. Navy	

EXHIBIT "A"

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

IN RE: FEDERAL-MOGUL : Chapter 11
GLOBAL, INC., T&N : Case Nos. 01-10578, et al.¹
LIMITED, et al., :
:
Debtors. :

**ORDER OF CLARIFICATION RE:
PROVISIONAL TRANSFER OF FRICTION PRODUCTS CLAIMS**

This matter having been opened upon the Court's own motion; and the Court having withdrawn the reference with respect to several motions to transfer and to provisionally transfer (the "Transfer Motions") claims pending in the several United States District Courts against defendant manufacturers of so-called "friction products" (respectively the "Friction Products Claims" and the "Friction Products Defendants") previously removed by the Friction Products Defendants from the several state courts; and for the reasons set forth in the letter opinion of the Court filed herewith; and for good cause shown

It is this day of January, 2002

ORDERED that this Order governs all Provisional Transfer Orders whether already issued by the Court or that may be issued in the future and those Orders shall not be construed in a manner inconsistent with the terms of this Order, and it is further

ORDERED that the Provisional Transfer Orders are limited in

¹See attached list.

effect to only those claims against the Friction Products Defendant(s) identified in the respective moving papers and Provisional Transfer Orders and that no other claims and no other parties are affected by the Provisional Transfer Orders, and it is further

ORDERED that any Friction Product Claim that would have been subject to a Provisional Transfer Order previously issued by this Court but for the fact that such Friction Product Claim had not yet been removed on the date the Provisional Transfer Order was issued is hereby provisionally transferred to this Court subject to further Order of this Court, and it is further

ORDERED that counsel identified in the Court's previous Provisional Transfer Orders shall provide to claimants provisionally transferred by this Order such notice and waivers of further service as was specified in the relevant previous Orders, and it is further

ORDERED that claimants provisionally transferred by this Order shall not be subject to the briefing schedule with respect to the Transfer Motion, and shall file no papers in opposition to the Transfer Motion except as provided by further Order of this Court.

/s/
ALFRED M. WOLIN, U.S.D.J.

IN RE: FEDERAL-MOGUL GLOBAL, INC.
Case Numbers

01-10578	01-10643	01-10700	01-10750
01-10580	01-10644	01-10701	01-10751
01-10582	01-10646	01-10702	01-10752
01-10585	01-10647	01-10703	01-10753
01-10586	01-10649	01-10704	01-10754
01-10587	01-10650	01-10705	01-10755
01-10589	01-10651	01-10706	01-10756
01-10591	01-10652	01-10707	01-10757
01-10593	01-10653	01-10708	01-10758
01-10594	01-10654	01-10710	01-10759
01-10596	01-10655	01-10711	01-10760
01-10598	01-10656	01-10712	01-10761
01-10599	01-10657	01-10713	01-10762
01-10600	01-10658	01-10714	01-10763
01-10601	01-10659	01-10715	01-10764
01-10603	01-10660	01-10716	01-10765
01-10604	01-10661	01-10717	01-10766
01-10605	01-10662	01-10718	01-10767
01-10606	01-10664	01-10719	01-10768
01-10608	01-10665	01-10721	01-10769
01-10610	01-10666	01-10722	01-10770
01-10611	01-10668	01-10723	01-10771
01-10613	01-10669	01-10724	01-10772
01-10614	01-10672	01-10726	01-10773
01-10615	01-10673	01-10727	01-10774
01-10617	01-10675	01-10728	
01-10618	01-10682	01-10729	
01-10619	01-10683	01-10730	
01-10620	01-10684	01-10731	
01-10621	01-10685	01-10732	
01-10622	01-10686	01-10733	
01-10623	01-10687	01-10734	
01-10625	01-10688	01-10736	
01-10626	01-10689	01-10737	
01-10627	01-10690	01-10739	
01-10629	01-10691	01-10741	
01-10630	01-10692	01-10742	
01-10632	01-10693	01-10743	
01-10633	01-10694	01-10744	
01-10634	01-10695	01-10745	

01-10637	01-10696	01-10746
01-10638	01-10697	01-10747
01-10640	01-10698	01-10748
01-10641	01-10699	01-10749

EXHIBIT "B"

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: :
: CHAPTER 11
FEDERAL-MOGUL GLOBAL, INC., :
: BANKRUPTCY NO. 01-10587
Debtor. : (jointly administered)

ORDER 1) DENYING THE MOTIONS TO TRANSFER THE "FRICTION PRODUCTS CLAIMS" AND 2) REMANDING THE FRICTION PRODUCTS CLAIMS

This matter having been opened before the Court upon the several motions of parties, denominated in the prior Orders of the Court as the "Friction Products Defendants," to transfer to this District into the above-captioned proceedings the claims against the movants previously denominated "Friction Products Claims"; and the Court having previously granted this motion on a provisional basis and the Friction Products Claims having already been provisionally transferred to this Court subject to a plenary hearing on the motion to transfer; and the Court having previously given notice to the parties that it would consider arguments directed to subject matter jurisdiction, abstention and remand in ruling upon the movants' applications; and the Court having reviewed the submissions of counsel and heard oral argument; and for the reasons set forth on the record at the hearing on those motions today, as supplemented by a written Opinion to follow; and for good cause shown

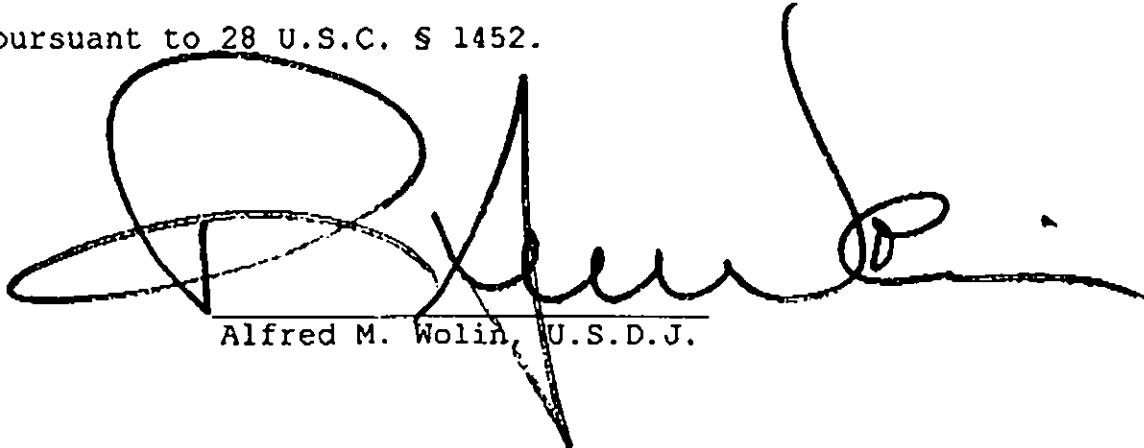
It is this 8th day of February 2002

ORDERED that the motions to transfer the Friction Products Claims are denied, and it is further

ORDERED that this Court lacks subject matter jurisdiction over the Friction Products Claims, and it is further

ORDERED that the Friction Products Claims are remanded to the state courts from which they were removed pursuant to 28 U.S.C. § 1447, and it is further

ORDERED that, in the alternative, the Friction Products Claims are remanded to the state courts from which they were removed pursuant to 28 U.S.C. § 1452.

A handwritten signature in black ink, appearing to read "Wolin", is positioned above a typed name. The signature is fluid and cursive, with a large loop on the left and a smaller loop on the right.

Alfred M. Wolin, U.S.D.J.

EXHIBIT "C"

No. 02-1426

In Re: Federal-Mogul Global, Inc., et al.

Daimler Chrysler Corporation, Ford Motor
Company and General Motors Corporation,
Appellants

(DC No. 01-10578 (AMW))

Present: Scirica, Circuit Judge

1) Emergency Motion for Stay Pending Appeal by Appellants

O R D E R

The forgoing Motion for stay is granted temporarily in order for the Court to receive responses to the motion from opposing counsel and for full consideration of the matter by a three judge panel. Appellees' shall file written responses to the motion for stay on or before 10:00 am, Friday, February 15, 2002.

For the Court,

G. Seeger
Clerk

Dated: FEB 11 2002

PSG/cc: CL, EW, EI
RM, MR, PK
ME, UK, WW
RP, JSG

TOTAL P.02

EXHIBIT "D"

Edward Finch - schedulingorder.pdf

EAD 031 3140 5-12-02

IN THE UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 02-1426, 02-1491, 02-1492, 02-1588, 02-1652, 02-1664, 02-1688 and 02-1741

IN RE: Federal-Mogul Global, Inc.

PRESENT: Becker, Chief Judge

ORDER

The following briefing schedule is hereby established in these consolidated appeals:

April 8, 2002: Appellants' joint opening brief on the merits of the district court's decision (14,000 words);

April 26, 2002: Appellees' joint response brief on the merits of the district court's decision and appellees' objections to appellate jurisdiction (21,000 words);

May 10, 2002: Appellants' joint reply brief on the merits of the district court's decision and response on appellate jurisdiction (21,000 words);

May 16, 2002: Appellees' joint reply brief on appellate jurisdiction (7,000 words).

It is expected that the various appellants and appellees will join in these joint briefs to the greatest extent practicable. However, an individual appellant or appellee may file a separate brief addressing discrete issues particular to that party, as long as those issues are not merely repetitive of the arguments advanced in the joint brief. Such separate briefs are due on the same date as the joint brief addressing the relevant issues. The foregoing word limitations are established for the joint briefs without prejudice to motions for extension of those limitations if necessary to respond to the separate submissions.

A brief will be considered timely filed if it is deposited with an express mail service on the due date for overnight delivery on the next business day. In addition, all briefs shall be served on all parties by e-mail by 5:00 p.m. Eastern time on the due date. A list of e-mail addresses is attached to this order.

640 021 27400 7-10-00

Oral argument will be held on June 17, 2002. The time will be fixed by the panel. The allocation of oral argument time will be as follows:

Appellants' opening argument: 1 hour

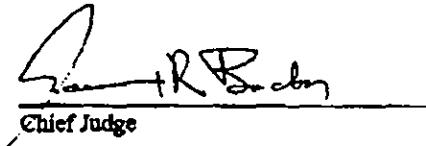
Appellees' argument: 1 hour, 20 minutes

Appellants' rebuttal: 20 minutes

The parties will determine an appropriate allocation of argument time for various counsel within these aggregate allotted times.

The temporary stay entered by this Court on February 11, 2002, as clarified by the order of March 19, 2002, will remain in effect until further order of the merits panel.

By the Court,



Chief Judge

Date: MAR 25 2002

mb/CC: All counsel of record

ATTACHMENT: e-mail addresses for service**Appellants' counsel:****Ford Motor Company, General Motors Corporation, DaimlerChrysler Corporation:**

David M. Bernick (david_bernick@chicago.kirkland.com)
Christopher Landau (clandau@dc.kirkland.com)
Eric B. Wolff (ewolff@dc.kirkland.com)

Honeywell:

Thomas F. Campion (thomas.campion@dbr.com)
Kenneth J. Wilbur (kenneth.wilbur@dbr.com)
Michael J. Reynolds (michael.reynolds@dbr.com)

International automakers:

David Wilks (wilksd@whitewmns.com)
Chris Singewald (singewaldc@whitewmns.com)

Official Unsecured Creditors Committee:

Robert B. Millner (RMillner@sonnenschein.com)

Hennessy Indus., Inc.:

Paul Day (paul.day@piperjaffray.com)
Henry A. Heiman (hheiman@hagblaw.com)

Holman Enterprises, B.F. Goodrich, Salvo Auto Parts:

Lee Baylin (leebaylin@baylinlaw.com)
Michael A. Stover (mstover@wtplaw.com)
Douglas F. Murray (dmurray@wtplaw.com)

Appellees' counsel:**Official Committee of Asbestos Claimants**

Elihu Inselbuch (ei@capdale.com)
Trevor W. Swett III (tws@capdale.com)

Ad Hoc Committee of Asbestos Claimants

Alan Rich (arich@baronbudd.com)
Charles S. Siegel (siegel@awpk.com)
Robert T. Haefele (RHaefele@Wilentz.com)
Nancy Davis (ndavis@nmlrp.com)

Kaeske-Reeves Claimants - Beaty, Salter, and Sturdevant

Kay Reeves (kreeves@kaeske-reeves.com)
J. Bradshaw (jbradshaw@kaeske-reeves.com)
Michael B. Pullano (mpullano@mccarter.com)

Waters & Kraus plaintiffs/Unofficial Committee of Select Asbestos Claimants

Charles S. Siegel (siegel@awpk.com)

Counsel for Federal-Mogul

Laura Davis Jones (ljones@pszyj.com)